

Who:

- > "Individual A" was a resident of Hidalgo County
- > "Individual B" was a businessman who lived and worked in Weslaco
- > "Individual C" was an attorney based in Rio Grande City
- > "Commissioner A" is an attorney and a former Weslaco City Commissioner who served from at least 1995 to 2014
- > "Commissioner B" is a current Weslaco City Commissioner who has served since 2009
- > "Company A" was an international engineering and construction company that performed large-scale infrastructure projects for public and private clients
- > "Person A" was an employee of Company A
- > "Company B" was an engineering company based in San Antonio
- > "Person B" was the owner of Company B
- > "Company C" was an engineering company based in McAllen
- > "Person C" was the owner of Company C
- > "Company D" is a concrete company based in Corpus Christi that is owned in part by Individual A

What:

Beginning in approximately 2008 and continuing through on or about at least December 2016 in the Southern District of Texas, the defendant orchestrated and participated in a bribery scheme to pay Weslaco city commissioners in exchange for their votes to benefit companies A, B and C.

In exchange, the defendant solicited and accepted over \$4 million in bribe payments from companies A, B and C.

The defendant attempted to conceal the bribery scheme by creating a false contract with Company B that purported to establish a consulting relationship.

After receiving the bribe payments the defendant used different methods to provide bribe payments to Commissioner A and Commissioner B.

To pay Commissioner A, the defendant provided checks totaling approximately \$1,405,000 to Individual A, who then laundered approximately \$405,000 in check payments to Commissioner A through Company D.

The bribe payments made by Individual A to Commissioner A were disguised as payments for legitimate business that Commissioner A never performed.

The purpose of disguising the payments was to conceal and promote the ongoing bribery scheme.

Another method that the defendant used to pay Commissioner A was through Individual C.

The defendant provided bribe payments to Individual C, who used an IOLTA bank account for Individual C's law practice to launder approximately \$90,000 in bribe payments and provide them to Commissioner A.

To conceal these bribe payments, Individual C attempted to establish a false attorney-client relationship among the defendant, Individual C and Commissioner A.

To compensate Individual C for laundering the funds, the defendant and Individual A agreed to and did help Individual C's friend obtain employment.

The purpose of disguising the payments was to conceal and promote the ongoing bribery scheme.

To provide bribe payments to Commissioner B, the defendant enlisted Individual B, who agreed to secure Commissioner B's participation and act as a conduit for bribe payments to Commissioner B.

The defendant paid Individual B approximately \$92,950 by checks and Individual B would cash the checks and split the cash with Commissioner B.

The purpose of making the payments in this way was to further conceal and promote the ongoing bribery scheme.

Throughout the conspiracy, the defendant would meet with Person A, Person B, and Person C to discuss the execution of the scheme, including what votes Commissioner A and Commissioner B needed to take to benefit companies A, B and C.

After paying individuals A, B and C, who in turn paid bribes to commissioners A and B during the relevant time period, the defendant retained at least \$2,514,414 in funds for his own personal benefit and use.

In exchange for the bribes, commissioners A and B voted in favor of infrastructure projects related to Weslaco's water processing facilities and steered over \$50 million in contracts to companies A, B and C. Companies A and B then granted subcontracts to Company C.

During each of the one-year periods beginning on or about 2008 and continuing at least through 2016, Weslaco received benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance or other form of federal assistance.